

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA, EASTERN DIVISION

CANDACE ALEXANDER
Plaintiff,

Vs.

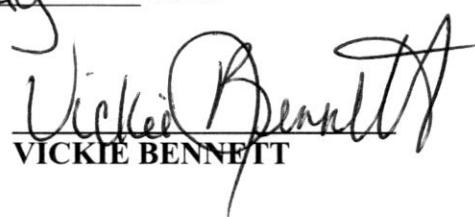
CIVIL ACTION NO.: 1:25-CV-980-CLM

JAMEKA SCALES, COREY BENNETT,
PATRICK BENNETT and
VICKIE BENNETT,
*Defendants.*MOTION FOR SUMMARY JUDGEMENT AND
MOTION TO DISMISS, PRESENTING DEFENSES OF FAILURE TO STATE A
CLAIM, LACK OF JURISDICTION UNDER RULE 12(B)

Comes now the Defendant, Vickie Bennett, and prays this Honorable Court will dismiss this frivolous cause of action based upon the following:

1. To dismiss the action because the complaint fails to state a claim against defendant upon which relief can be granted.
2. To dismiss the action on the grounds that the court lacks jurisdiction because the amount actually in controversy is less than ten thousand dollars exclusive of interest and costs.
3. Attached hereto and incorporated herein by reference is my Affidavit as Exhibit "A".
4. That Plaintiff sued me for actions between her husband and my son and Defendant, Corey Bennett. She does not have standing to sue me over someone else's actions.
5. That there is no cause of action for the rantings in the Petition. I have done nothing.
6. That this is a fraudulent case.
7. That my son and Defendant, Corey Bennett, filed a criminal charge against Keith Alexander. The Plaintiff's entire case is due to her husband's criminal charge. I had nothing to do with the criminal charge.
8. I fear for my daughter's mental health. It looks like an artificial intelligence pleading.

Respectfully submitted the 6 day of Aug 2025.


VICKIE BENNETT

STATE OF MISSISSIPPI)
COUNTY OF TISHIMINGO)

AFFIDAVIT OF VICKIE BENNETT

Before me, a duly authorized Notary Public in and for the State of Mississippi, did appear, Vickie Bennett, who, being personally known to me, did swear and affirm as follows:

My name is Vicki Bennett, I am over the age of nineteen (19) years and one of the Defendants in Civil Action No.: 1:25-CV-980-CLM, and I have personal knowledge of the matters set forth herein. I am a citizen of Tishomingo County, Mississippi.

My daughter is Candace Alexander, and she is married to Keith Alexander. Mr. Alexander harassed my son and Defendant, Corey Bennett. My son and Defendant, Corey Bennett, filed a criminal charge against him in Tishomingo County State Court. I have nothing to do with the criminal charge.

Candace sued me in this case. I have done nothing to Candace. This is a frivolous case. I am worried about Candace's mental health.

There is no cause of action in this case. Candace is using the Court to harass me and my family. Please read the complaint. Candace's pleadings sound like they are generated by artificial intelligence.

I did not “orchestrated long-term emotional surveillance of Candace, weaponized spiritual guilt messages” or use “indirect pressure through her children to maintain emotional leverage” over Candace.

On April 23, 2025, the Plaintiff Candace Alexander initiated a group text that included me as well as Defendants Corey Bennett, Jameka Scales, and Patrick Bennett. I did, as the Plaintiff's claim states, remain silent during the group text messaging. This was not to coordinate "refusal to intervene or correct the record functions as tacit endorsement of the affidavit" and it was not a "confirmation of a broader pattern of collusion".

I did not engage “in a planned pressure campaign using family roles, spiritual manipulation, and coordinated silence to exploit Candace’s vulnerability and force re-engagement”. I did not serve “as the emotional architect, using her children and allies to apply pressure while maintaining plausible deniability” against the Plaintiff. I did and still do pray for my daughter, Candace Alexander. I have sent her spiritual text message, as I do with all of my children. The Plaintiff

herself states in her claim that she was aware that I send spiritual messages to all of her siblings and not just her. This was not and is not “spiritual guilt tactics”.

I did not violate Mississippi, Alabama, Missouri, and Texas laws by “Harassment through coordinated conduct”, show “Indirect or coordinated behaviors causing alarms”, use “Harassment by purposeful emotional disturbance”, or “Harassment through repeated communication or intent to cause distress” against the Plaintiff.

I am not responsible for “constructive collusion, intentional infliction of emotional distress, and spiritual harassment as coercive speech” against my daughter, Candace Alexander.

The Plaintiff states there was a “Breach of Verbal Boundaries” following her “no-contact stance” against me. However, she added me to a group text with the other Defendants and then filed her complaint against me as a “silent witness” and for my “silence” and “refusal to reply” to the group messages.

The Plaintiff does not even have standing to ask for what she is asking for. The Plaintiff needs a mental health evaluation.

Further, Affiant sayeth not.

Vickie Bennett
VICKIE BENNETT

STATE OF MISSISSIPPI)
COUNTY OF TISHIMINGO)

Before me, a notary public, in and for said county and said state, personally appeared **Vickie Bennett** who being known to me, and being by me first duly sworn, does depose and say that she has knowledge of the facts and matters stated in the above complaint and that said facts are true and correct according to the best of her knowledge, information, and belief.

Sworn to and subscribed before me this the 6 day of August, 2025.

Reyton Cummings
NOTARY PUBLIC
My Commission Exp.: [REDACTED]



MY COMMISSION EXPIRES JANUARY 1, 2028

22 CR 95

Tishomingo, MS 38873

Vickie Bennett

